



# ADECA's EMERGENCY SOLUTIONS GRANTS PROGRAM

COMPLIANCE WORKSHOP FOR  
PY2013 HESG SUBRECIPIENTS  
NOVEMBER 7, 2013

# ADECA's ESG WEB PAGE

- [www.adeca.alabama.gov](http://www.adeca.alabama.gov)
- Scroll over “Divisions” (top right)
- Click “Community and Economic Development”
- Click “Community Development Programs” (left)
- Click “Emergency Solutions Grant”

# CONTACT INFORMATION

- Maureen Neighbors, Community Services Unit Chief
  - [maureen.neighbors@adeca.alabama.gov](mailto:maureen.neighbors@adeca.alabama.gov)
  - 334-242-5467
- Shonda Gray, ESG Program Manager
  - [shonda.gray@adeca.alabama.gov](mailto:shonda.gray@adeca.alabama.gov)
  - 334-353-0288

# CONTACT INFORMATION

- Stephanie Rankins, HOPWA /ESG
  - [stephanie.rankins@adeca.alabama.gov](mailto:stephanie.rankins@adeca.alabama.gov)
  - 334-242-5384
- Valerie Byrd, ESG Accountant
  - [valerie.byrd@adeca.alabama.gov](mailto:valerie.byrd@adeca.alabama.gov)
  - 334-242-5246

# CONTACT INFORMATION

- Lee Flennory, Environmental Specialist
  - [lee.flennory@adeca.alabama.gov](mailto:lee.flennory@adeca.alabama.gov)
  - 334-353-1700
- Johnnie Streeter, FH & EO Specialist
  - [johnnie.streeter@adeca.alabama.gov](mailto:johnnie.streeter@adeca.alabama.gov)
  - 334-242-5451

# E-VERIFY (for nonprofit Subrecipients only)

- Compliance with the Beason-Hammon Alabama Taxpayer and Citizen Protection Act (Immigration Law)
- Must be enrolled in the E-Verify program maintained by the U.S. Dept. of Homeland Security, **only required if agency has one or more paid employees – submit MOU**

# E-VERIFY (for nonprofit Subrecipients only)

- Enrollment is available at (<http://immigration.alabama.gov>)
- Submit original Certificate of Compliance

# POLICIES & PROCEDURES

- Eligibility
- Coordination of services
- Prioritizing assistance
- Length of assistance to be provided
- Program participants' share in costs



# POLICIES & PROCEDURES

- Type, amount, and duration of housing stabilization and relocation services to be provided
- Targeting/providing essential services related to street outreach
- Terminating assistance
- Access to program for persons of limited English proficiency

# PROCUREMENT

- Small purchase procedures
- Competitive negotiation (RFP)
- Competitive sealed bids
- Sole source procurement

# FINANCIAL

- Submit supporting documentation of
  - Expenditures to be reimbursed with ESG funds
  - Expenditures paid/value of services provided with match
  - Program income (returned deposits)

# MATCH

- Can be obtained from any local, state, federal, or private source, **except** ESG
- Other program regulations must not prohibit those funds from being used as match for ESG
- If ESG is being used for match for another program, funding from that program cannot be used as match for ESG

# MATCH

- Must be provided after date of grant agreement
- Cash contributions must be expended within the expenditure deadline
- Noncash contributions must be made within the expenditure deadline

# MATCH

- Funds used to match another program cannot be used as match for ESG
- Services provided by individuals are valued at rates consistent with those ordinarily paid for similar work in the organization or by other employers
- Document special rates for noncash contributions

# INDIRECT COSTS

Please contact ADECA for guidance on indirect costs.

- Must have an indirect cost rate proposal developed in accordance with OMB Circular A-87
- Indirect costs charged to an activity must be added to the direct costs charged for that activity when determining the expenditure limit

# PARTICIPANT FILE DOCUMENTATION

- Entry in HMIS/Comparable Database
- Eligibility
- Case Management Notes
- Type/amount of assistance provided
- Lease





# PARTICIPANT FILE DOCUMENTATION

- Rental Assistance Agreement
- Rent Reasonableness Checklist
- Compliance with Fair Market Rent
- Housing Habitability Standards Checklist
- Lead-Based Paint Checklist

# PARTICIPANT ELIGIBILITY

- Homelessness Prevention
  - Conduct initial evaluation
  - Meet criteria of “at-risk of homelessness”, categories 1, 2, and 3 **or** criteria of homeless definition categories 2, 3, or 4
- Rapid Re-Housing
  - Conduct initial evaluation
  - Meet criteria of category 1 of homeless definition final rule

# PARTICIPANT ELIGIBILITY

- Homelessness Prevention
  - Annual income below 30% of AMI at program entry
  - Lacks support networks and financial resources to remain in housing
  - Re-evaluation at least once every 3 months
- Rapid Re-Housing
  - No income threshold at program entry
  - Lacks support networks and financial resources to obtain housing
  - Re-evaluation annually

# ELIGIBILITY

For both Prevention and Re-housing

At re-evaluation:

1. Annual income at or below 30% AMI
2. Lacks support networks and sufficient resources to retain housing without ESG assistance
3. Annual income is calculated based on guidelines found at 24 CFR 5.609
4. Participants should report changes in income or circumstances that affect their need for ESG assistance

# CASE MANAGEMENT

- Program participants are required to meet with their case managers monthly while receiving assistance (unless prohibited by laws regarding domestic violence issues)
- Case manager must develop a housing stability plan to assist participants in retaining permanent housing after assistance ends

# RENTAL ASSISTANCE

- Only tenant-based rental assistance is eligible (participant selects housing unit )
- Rent cannot exceed the Fair Market Rent
- Rent must comply with HUD's Rent Reasonableness Standards
- ESG funds cannot be used to pay late fees generated after person enters program

# RENTAL ASSISTANCE

- Mortgage payments are ineligible
- Requires a legally binding, written lease between the owner and participant (except for arrears only)
- Agencies providing assistance must enter into a rental assistance agreement with the landlord/owner to whom rental payments will be made

# RENTAL ASSISTANCE AGREEMENT

- Set forth terms under which rental assistance will be provided (*includes requirements at § 576.106*)
- Must contain same due date, grace period, and penalty requirements as participant's lease



# RENTAL ASSISTANCE AGREEMENT

During term of agreement:

- Owner must give agency a copy of any notice provided to the participant to vacate the housing unit
- Owner must give agency a copy of any complaint used under state or local law to commence an eviction action against participant



# HOMELESS PARTICIPATION

To the maximum extent possible, involve homeless persons/families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG

# RECORDKEEPING AND REPORTING

- Submit copies of ESG Program Policies and Procedures, all procurement policies, contracts, and documentation of compliance with procurement policies
- Maintain records for 5 years after project closeout
- For renovation/conversion, maintain records for 10 years after closeout